

# Exhibit F

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3           AT CHARLESTON

4   IN RE: ETHICON, INC.,           :Master File No.  
5   PELVIC REPAIR SYSTEM         :2:12-MD-0237  
6   PRODUCTS LIABILITY           :  
7   LITIGATION                    :MDL No. 2327

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8   THIS DOCUMENT RELATES TO :JOSEPH R. GOODWIN  
9   THE CASES LISTED BELOW    :U.S. DISTRICT JUDGE  
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11   Mullins, et al. V.           2:12-cv-02952  
12   Ethicon, Inc., et al.  
13   Sprout, et al. V.           2:12-cv-07924  
14   Ethicon, Inc., et al.  
15   Iquinto v. Ethicon,         2:12-cv-09765  
16   Inc., et al.  
17   Daniel, et al. V.           2:13-cv-02565  
18   Ethicon, Inc., et al.  
19   Dillon, et al. V.           2:13-cv-02919  
20   Ethicon, Inc., et al.  
21   Webb, et al. V.           2:13-cv-04517  
22   Ethicon, Inc., et al.  
23   Martinez v. Ethicon,        2:13-cv-04730  
24   Inc., et al.  
25   McIntyre, et al. V.         2:13-cv-07283  
26   Ethicon, Inc., et al.  
27   Oxley v. Ethicon,           2:13-cv-10150  
28   Inc., et al.  
29   Atkins, et al. V.           2:13-cv-11022  
30   Ethicon, Inc., et al.  
31   Garcia v. Ethicon,          2:13-cv-14355  
32   Inc., et al.  
33   Lowe v. Ethicon,            2:13-cv-14718  
34   Inc., et al.  
35   Dameron, et al. V.          2:13-cv-14799  
36   Ethicon, Inc., et al.  
37   Vanbuskirk, et al. V.       2:13-cv-16183  
38   Ethicon, Inc., et al.

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41           SEPTEMBER 22, 2015  
42           BRUCE A. ROSENZWEIG, M.D.

1	CAPTION CONTINUED:	
2	Mullens, et al. V.	2:13-cv-16564
3	Ethicon, Inc., et al.	
	Shears, et al. V.	2:13-cv-17012
4	Ethicon, Inc., et al.	
	Javins, et al. V.	2:13-cv-18479
5	Ethicon, Inc., et al.	
	Barr, et al. V.	2:13-cv-22606
6	Ethicon, Inc., et al.	
	Lambert v. Ethicon,	2:13-cv-24393
7	Inc., et al.	
	Cook v. Ethicon, Inc.	2:13-cv-29260
8	Stevens v. Ethicon,	2:13-cv-29918
	Inc., et al.	
9	Harmon v. Ethicon, Inc.	2:13-cv-31818
	Snodgrass v. Ethicon,	2:13-cv-31881
10	Inc., et al.	
	Miller v. Ethicon, Inc.	2:13-cv-32627
11	Matney, et al. V.	2:14-cv-09195
	Ethicon, Inc., et al.	
12	Jones, et al. V.	2:14-cv-09517
	Ethicon, Inc., et al.	
13	Humbert v. Ethicon,	2:14-cv-10640
	Inc., et al.	
14	Gillum, et al. V.	2:14-cv-12756
	Ethicon, Inc., et al.	
15	Whisner, et al. V.	2:14-cv-13023
	Ethicon, Inc., et al.	
16	Tomblin v. Ethicon,	2:14-cv-14664
	Inc., et al.	
17	Schepleng v. Ethicon,	2:14-cv-16061
	Inc., et al.	
18	Tyler, et al. V.	2:14-cv-19110
	Ethicon, Inc., et al.	
19	Kelly, et al. V.	2:14-cv-22079
	Ethicon, Inc., et al.	
20	Lundell v. Ethicon,	2:14-cv-24911
	Inc., et al.	
21	Cheshire, et al. V.	2:14-cv-24999
	Ethicon, Inc., et al.	
22	Burgoyne, et al., V.	2:14-cv-28620
	Ethicon, Inc., et al.	
23	Bennett, et al., V.	2:14-cv-29624
24	Ethicon, Inc., et al.	

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SEPTEMBER 22, 2015

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The deposition of BRUCE A. ROSENZWEIG,

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M.D., called for examination, taken pursuant

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to the Federal Rules of Civil Procedure of the

7

United States District Courts pertaining to the

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taking of depositions, taken before JULIANA F.

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ZAJICEK, CSR No. 84-2604, a Certified Shorthand

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Reporter of said State of Illinois, at the offices

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of Wexler Wallace LLP, Suite 3300, 55 West Monroe

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Street, Chicago, Illinois, on September 22, 2015,

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at 10:05 a.m.

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1           A.       We can go to page 4 and 5 where in general  
2 my expert opinions can be summarized as following.

3           Q.       So we have numbered paragraphs with  
4 letters A, B, C, D, E, F on page 4, carrying over G,  
5 H, I, J page 5, correct?

6           A.       That is correct.

7           Q.       And that's a summary of your opinions?

8           A.       That is correct.

9           Q.       In your opinion should Ethicon's TVT  
10 retropubic device be significantly changed or modified  
11 in its design?

12           MR. CARTMELL: Object to the form.

13 BY MR. SNELL:

14           Q.       And if you have such an opinion, tell me  
15 how it should be changed?

16           A.       The use of a -- and we are talking about  
17 an embodiment of something that is currently available  
18 on the market, right?

19           Q.       No.

20           A.       So the design should be a device that uses  
21 a partially absorbable mesh with -- such as Ultrapro  
22 which has been shown to have less stiffness, large  
23 enough pore size, light enough weight to decrease the  
24 risk of the -- long-term risks of the procedure to a

1 level where the risk/benefit analysis is not  
2 significantly skewed to the risk.

3 Q. How many studies are there that you are  
4 aware of that analyzed the TVT retropubic device with  
5 the meshes currently in it?

6 A. How many studies are there?

7 Q. Yes, sir.

8 A. There are a lot.

9 Q. How many randomized control trials are  
10 there for the TVT retropubic device using the prolene  
11 polypropylene mesh?

12 A. High quality, long term?

13 Q. No, no, altogether.

14 A. Altogether, over 100.

15 Q. Okay. And now, so how many of those TVT  
16 retropubic device randomized control trials do you  
17 believe are high quality?

18 A. If you look at the assessment of the  
19 literature that's out there, the majority are of a  
20 moderate quality to low quality. They are short-term  
21 studies. They have a low number of subjects in each  
22 of the groups. They are looking mostly at efficacy.  
23 Safety is not a primary endpoint for any of the  
24 long-term studies that I have seen. They are all

1 A. That is correct.

2 Q. And that's the Okulu study we discussed  
3 earlier today?

4 A. That is correct.

5 Q. That was in 2003?

6 A. Yes.

7 Q. So for your statement that the lighter  
8 weight, larger pore mesh should have been used, you  
9 can cite to a single clinical study in women with the  
10 application of stress urinary incontinence, the Okulu  
11 study?

12 MR. CARTMELL: Object to the form.

13 BY THE WITNESS:

14 A. Well, there are other studies showing the  
15 why you would move to a -- in a pelvic floor  
16 application to a larger pore, lighter weight, smaller  
17 filament, less stiff mesh.

18 BY MR. SNELL:

19 Q. But the larger pore, lighter weight, less  
20 stiff theory that you are talking about has only been  
21 tested in one study you can point me to for the  
22 application of stress urinary incontinence?

23 MR. CARTMELL: Object to the form.

24 BY MR. SNELL:

1 Q. Correct?

2 A. Specifically for stress urinary  
3 incontinence, yes, but for -- but to show why that is,  
4 there are multiple studies that show why it's  
5 advantageous in the pelvic floor to have a larger  
6 pore, lighter weight, less stiff mesh because of  
7 processes that lead to cell death, that lead to smooth  
8 muscle dysfunction, that lead to more erosions, that  
9 lead to more complications.

10 Q. The Moalli papers you are referring to are  
11 not in women who received Ultrapro and who received  
12 Ultrapro for stress urinary incontinence and were  
13 followed over one or more years, correct?

14 A. The multiple studies by the Moalli group  
15 that looks at the stiffness of mesh and the  
16 consequence of stiffness of mesh are in an animal  
17 model. There is basic science research that shows the  
18 difference between the stiffness of mesh. There are  
19 multiple other clinical studies that show the decrease  
20 in complications associated with a lighter weight,  
21 larger pore mesh compared to a medium weight, smaller  
22 pore mesh.

23 Q. And just so I'm clear, all of the Moalli  
24 papers you cited are animal model papers?



1 in women who don't have exposure and don't have  
2 complications, do you?

3 A. We reviewed a paper earlier that did, but  
4 in the majority of cases, no.

5 Q. Are there any clinical studies assessing  
6 TVT in women with stress urinary incontinence that  
7 reports that cytotoxicity of the mesh is a cause of  
8 their -- any reported complications?

9 A. Erosion is a sign of cytotoxicity.

10 MR. SNELL: Move to strike.

11 BY MR. SNELL:

12 Q. You are telling me stuff I already know  
13 you've told me before. I'm trying to be respectful  
14 with Tom over hear screaming at me.

15 MR. CARTMELL: You've asked that question you  
16 just asked too.

17 MR. SNELL: I haven't asked that question.

18 MR. CARTMELL: Yes, you have.

19 MR. SNELL: Read back my question, please.

20 (WHEREUPON, the record was read  
21 by the reporter as requested.)

22 MR. CARTMELL: Objection; asked and answered.

23 If you need to tell him again, tell him again.

24 BY THE WITNESS: